

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA
WINSTON-SALEM DIVISION**

FEDERAL TRADE COMMISSION,
et al.

Plaintiffs,

v.

SYNGENTA CROP PROTECTION AG,
et al.

Defendants.

Case No. 1:22-cv-828

**DEFENDANT CORTEVA, INC.'S
MOTION TO FILE UNDER SEAL
PORTIONS OF ITS MEMORANDUM
IN SUPPORT OF ITS MOTION TO
DISMISS**

Pursuant to Local Rule 5.4(b)(2), Defendant Corteva, Inc. (“Corteva”) respectfully moves this Court to file under seal the confidential portions of its Memorandum in Support of its Motion to Dismiss the First Amended Complaint in this matter (the “Memorandum”). Pursuant to Local Rule 5.4(c)(3), Corteva submits the accompanying Memorandum in Support of Corteva’s Motion to File Under Seal.

The information in the Memorandum that Corteva requests be permanently sealed includes the terms of Corteva’s discount programs with non-party distributors and information about Corteva’s business decisions, strategies and plans.

Dated: January 13, 2023

Respectfully submitted,

/s/ Mark E. Anderson

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83.1(d).

Attorneys for Defendant Corteva, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of January, 2023, I caused the foregoing MOTION TO FILE UNDER SEAL, and all attachments thereto, to be filed electronically with the Clerk of Court via the Court's CM/ECF system. Counsel for all parties in this case are registered CM/ECF users and will be served by the CM/ECF System.

This the 13th day of January, 2023.

MCGUIREWOODS LLP

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